

ALEXANDER. JUDE AVELINO,
Plaintiff,

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW
YORK**

03 MDL 1570 (GBD)(SN)
Case No. 17-CV-08617

CERTIFICATION OF PLAINTIFF

KINGDOM OF SAUDI ARABIA,
et al.

Defendants.

ALEXANDER JUDE AVELINO, of full age, hereby certifies as follows:

1. I am the Plaintiff in the above-captioned class action matter and, as such, I am fully familiar with the facts and circumstances set forth herein. I submit this Certification in opposition to my counsel, Napoli Law, PLLC's second motion to withdraw as counsel.

2. First and foremost, I do not consent to the withdrawal of Napoli Law as my counsel in this matter.

3. The impetus for this present motion is that Paul Napoli, Esq. of the Napoli Firm is the brother of my soon-to-be ex-wife, Patricia Avelino, *nee* Napoli ("Patricia"). A divorce action has been filed in the State of New Jersey under the docket of FM-20-1607-20W.

4. The purpose of this motion to withdraw as counsel is to allow for the firm of Napoli Law, PLLC to represent Patricia.

5. By order of January 29, 2021, the Honorable Lisa F. Chrystal, J.S.C. entered an order disqualifying the Napoli Firm from representing Patricia in the New Jersey divorce matter.

6. I have been represented by Mr. LoPalo of the Napoli Firm in this matter for many years regarding this lawsuit.

7. At this time, the Napoli Firm no longer represents Patricia in the New Jersey matter, so no conflict exists as to my representation in this present VCF action.

8. I believe that this present motion represents a bad faith attempt to accomplish a "run around" of the New Jersey court's order disqualifying Mr. Napoli's firm from representing Patricia in her divorce matter.

9. I believe that this present motion is an attempt, however misguided, to somehow remove the conflict of interests in representing Patricia in the New Jersey divorce matter by ceasing to represent me in this current case.

10. Despite my counsel's assertion that the Napoli Firm's withdrawal in this matter would not prejudice me, it would indeed be prejudicial for me, after many years of representation, to seek out and obtain new counsel to represent me in this case.

11. Therefore, I oppose the Napoli Firm's motion to withdraw as counsel in this matter.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

DATED: 2/8/21


ALEXANDER JUDE AVELINO